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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

PAWS UP RANCH, LLC, a limited liability company with citizenship in Nevada; PAWS UP FOUNDATION, a non-profit corporation with citizenship in Delaware and Montana; and PAWS UP LAND COMPANY, LLC, a limited liability company with citizenship in Nevada,

Plaintiffs,

v.

CHRISTOPHER GREEN, a citizen of the State of Georgia; LAWTON HALL, a citizen of the State of Georgia; ALTIUM DEVELOPMENT GROUP, LLC, a limited liability company with citizenship in Illinois; ALTIUM DEVELOPMENT GROUP, LP, a limited partnership with citizenship in Illinois; GREENHALL CAPITAL, LLC, a limited liability company with citizenship in Georgia; RIVERSIDE PREMIER DEVELOPMENT, LLC, a limited liability company with citizenship in Arkansas; LION SHARE CAPITOL, LLC, a limited liability company with citizenship in Kansas; HAYMAN PRIVATE EQUITY, LLC, a limited liability company with citizenship in Massachusetts; MASTER VISION GROUP, USA, INC., a corporation with citizenship in New York; SOVREN MANAGEMENT, LLC, a limited liability company with citizenship in Utah; MOUNTAIN ATLANTIC LENDING, LLC, a limited liability company with citizenship in Connecticut; COHEN COMMERCIAL EQUITY, LLC, a limited liability company with citizenship in California; EQUITY FINANCIAL, LLC, a limited liability company with citizenship in Florida and New York; WORLDWIDE INVESTMENTS, LLC II, a limited liability company with citizenship in Illinois; METROPOLITAN BANCORP,

Case No: 12-CV-01547-GMN-NJK

**STIPULATION AND ORDER  
TO VOLUNTARILY DISMISS  
CLAIMS FOR VIOLATIONS OF THE  
GEORGIA, ILLINOIS, AND NEVADA  
LOAN BROKERS ACTS**

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LTD., a limited liability company with citizenship in Oklahoma; MKS, LLC, a limited liability company with citizenship in Florida; DOES 1 THROUGH 20; and ROE CORPORATIONS 1 THROUGH 20.  
And Related Claims

**STIPULATION AND ORDER TO VOLUNTARILY DISMISS CLAIMS  
FOR VIOLATIONS OF THE GEORGIA, ILLINOIS, AND NEVADA LOAN BROKERS  
ACTS**

COMES NOW Plaintiffs Paws up Ranch, LLC, d/b/a The Resort at Paws Up, Paws Up Foundation, and Paws Up Land Company, LLC (collectively, “Plaintiffs”), appearing by and through its attorneys, Airene Williamson, Esq., of the WILLIAMSON LAW OFFICE, and Leland Eugene Backus, Esq., of BACKUS, CARRANZA AND BURDEN, and Defendants Christopher Green (“Green” or “Defendant”), appearing by and through his attorney of record, Michael B. Lee, Esq. of MICHAEL B. LEE, PC, and hereby stipulate and agree as follows:

1. Plaintiffs filed their Original Complaint in this Court on August 30, 2012. (*See* Compl., ECF No. 1). Shortly thereafter, Plaintiffs filed their First Amended Complaint on October 09, 2012. (*See* FAC, ECF No. 9). On September 30, 2014, the Court granted a Motion to Dismiss filed by the Altium Defendants because Plaintiffs, *inter alia*, failed to sufficiently satisfy Rule 9(b)’s pleading standard for their civil RICO claim. (Order, ECF No. 226). Moreover, the Court denied as moot Plaintiff’s Motion for Leave to Amend, whereby Plaintiffs sought to amend their complaint as to Defendants Lawton Hall (“Hall”) and Green to include causes of action for Negligence Per Se, Breach of Fiduciary Duty, Negligent Misrepresentation, Piercing the Corporate Veil (Alter Ego), and Conspiracy. (*Id.*).

2. Plaintiffs filed the second amended complaint on October 14, 2014. (ECF No. 227).

3. Hall filed a Motion to Dismiss the second amended complaint (ECF No. 230) and former Defendants Altium Development Group, LLC (“Altium LLC”) and Altium Development Group, LP (“Altium LP”) (collectively, the “Altium Defendants”) filed a similar Motion to Dismiss (ECF No. 231) as well.

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4. On July 8, 2015, this Honorable Court granted in part, denied in part, Hall's Motion to Dismiss (ECF No. 230); particularly, Plaintiffs' claims against Hall for violations of the Georgia, Illinois, and Nevada Loan Brokers Acts as pleaded in the Second Amended Complaint: 14. VIOLATIONS OF THE GEORGIA LOAN BROKERS ACT; 15. VIOLATION OF THE ILLINOIS LOAN BROKERS ACT; and 16. VIOLATIONS OF THE NEVADA LOAN BROKERS ACT. The remaining claims survived the dismissal of those claims. This Court also granted, in full, Atrium Defendants' motion to dismiss (ECF No. 231).

5. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), and in conformance with this Honorable Court's prior Orders, Plaintiffs and Green hereby stipulate to dismiss the referenced claims in counts 14, 15 and 16 for violations of the Georgia, Illinois, and Nevada Loan Brokers Acts.

6. Plaintiffs and Green request that this Honorable Court extend the time for Green to answer or otherwise respond to Plaintiffs' second amended complaint to August 5, 2015.

DATED this 23rd day of July, 2015.

MICHAEL B. LEE, P.C.

DATED this 24th day of July, 2015.

WILLIAMSON LAW OFFICE, PLLC

/s/ Michael Lee  
Michael B. Lee, Esq.  
Nevada State Bar # 10122  
*Attorney for Defendant Christopher Green*

/s/ Airene Williamson  
Airene Williamson, Esq.  
Nevada State Bar # 11594  
*Attorney for Plaintiffs*

**IT IS SO ORDERED.**

  
Gloria M. Navarro, Chief Judge  
United States District Court

Respectfully Submitted By:

**DATED:** 07/28/2015.

/s/ Michael Lee  
Michael B. Lee, Esq. (NSB 10122)  
*Attorney for Defendant Christopher Green*